UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

SEP 26 2014

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

REPLY TO THE ATTENTION OF:

Mr. Tony Aitkin
Director of Operations
Tufco Technologies, Inc.
3161 S. Ridge Road
Green Bay, Wisconsin 54304

Re: Notice of Violation
RCRA Compliance Evaluation Inspection
Tufco Technologies, Inc.
EPA I.D. No.: WID074771908

Dear Mr. Aitkin:

On April 29, 2014, a representative of the U. S. Environmental Protection Agency inspected Tufco Technologies, Inc. (Tufco) located in Green Bay, Wisconsin. The purpose of the inspection was to evaluate Tufco's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the generation, treatment and storage of hazardous waste. Please find enclosed a copy of the inspection report for your reference.

Based on the information provided by Tufco personnel, a review of records, and personal observations made by the inspector at the time of the investigation, EPA has determined Tufco is engaged in the management of hazardous waste without a hazardous waste storage license, and is in violation of the requirements of the Wisconsin Administrative Code and the United States Code of Federal Regulations (CFR). To be eligible for the exemption from the requirement to obtain a hazardous waste storage license, Tufco must be in compliance with the conditions of the Wisconsin Administrative Code s. NR 662.034(1) and (3) [40 CFR § 262.34(a) and (c)]. Specifically, we find that Tufco is in noncompliance with the following conditions for the storage license exemption, and in violation of the following requirements:

1. A large quantity generator must determine whether its waste is hazardous. See, WAC s. NR 662.011 [40 CFR § 262.11]. At the time of the inspection, Tufco did not make a hazardous waste determination of spent solution of caustic cleaner used in the parts washer near the flex press unit. The MSDS for product listed a pH above 13.0. Tufco, therefore, violated the above-referenced generator requirement.

2. In order to avoid the need for a hazardous waste storage license, a large quantity generator using satellite accumulation containers must label the containers with the words "Hazardous Waste" or with other words that identify the contents of the containers. See, WAC ss. NR 662.034(3)(a)(2) [40 CFR § 262.34(c)(1)(ii). At the time of the inspection, a container accumulating waste aerosol waste in the facility's maintenance area was not properly labeled. Tufco, therefore, failed to comply with the above-mentioned condition for a storage license exemption.

3. In order to avoid the need for a hazardous waste storage license, a large quantity generator using containers to accumulate hazardous waste must label the containers with accumulation start date. See, WAC ss. NR 662.034(1)(b) [40 CFR § 262.34(a)(2)]. At the time of the inspection, a 55-gallon full drum of spent aerosl waste stored in the facility's storage area (second of two rooms) was not dated with accumulation start date. Tufco, therefore, failed to comply with the above-mentioned conditions for a storage permit exemption.

4. In order to avoid the need for a hazardous waste storage license, a large quantity generator using satellite accumulation containers must always keep the containers closed except when it is necessary to add or remove waste. See, WAC ss. NR 662.034(3)(a)(1) and 665.0173(1). [40 CFR §§ 262.34(c)(1)(i), 265.173(a)]. This is also a requirement of owners and operators of hazardous waste storage facilities that use hazardous waste containers, under WAC s. NR 664.0173(1) [40 CFR § 264.173(a)]. At the time of the inspection, 5-gallon container accumulating waste labs in Lab #3 was open, and waste was not being added to or removed from the container. Tufco, therefore, failed to comply with the above-mentioned condition for a storage license exemption, and violated the storage facility container closure requirement.

5. In order to avoid the need for a hazardous waste storage license, a large quantity generator using accumulation containers must always keep the containers closed except when it is necessary to add or remove waste. See, WAC ss. NR 662.034(3)(a)(1) and 665.0173(1). [40 CFR §§ 262.34(c)(1)(i), 265.173(a)]. This is also a requirement of owners and operators of hazardous waste storage facilities that use hazardous waste containers, under WAC s. NR 664.0173(1) [40 CFR § 264.173(a)]. At the time of the inspection, 5-gallon container ignitable waste in the Sachet #2 production line was open, and waste was not being added to or removed from the container. Tufco, therefore, failed to comply with the above-mentioned condition for a storage license exemption, and violated the storage facility container closure requirement.

6. In order to avoid the need for a hazardous waste storage license, a large quantity generator using satellite accumulation containers must label the containers with the words "Hazardous Waste" or with other words that identify the contents of the containers. See, WAC ss. NR 662.034(3)(a)(2) [40 CFR § 262.34(c)(1)(ii)]. At the time of the inspection, a 5-gallon container ignitable waste in the Sachet #2 production line was not properly labeled. Tufco, therefore, failed to comply with the above-mentioned condition for a storage license exemption.

7. In order to avoid the need for a hazardous waste storage license, a large quantity generator must inspect accumulation containers and areas where containers are stored at least weekly for evidence of leakage, corrosion, or deterioration. See, WAC ss. NR 662.034(1)(a)(1); 665.0174 [40 CFR §§ 262.34(a)(1)(i); 265.174)]. This is also a requirement of owners and operators of hazardous waste storage facilities, under WAC s. NR 664.0174 [40 CFR § 264.174]. At the time of the inspection, Tufco failed to inspect accumulation containers and areas where containers are stored at least weekly for evidence of leakage, corrosion, or deterioration. No inspection logs were available for review for 2014. Available inspection logs covered a period of time from 08/27/2012 through 12/16/2013 and indicated that inspections were approximately conducted once every 2-4 months. Tufco, therefore, failed to comply with the above-mentioned condition for a storage license exemption, and violated the weekly inspection requirement.

8. In order to avoid the need for a hazardous waste storage license, a large quantity generator must include a list of home addresses and phone numbers of emergency coordinators listed in the facility's contingency plan. See, WAC ss. NR 662.034(1)(d); 665.0052(4) [40 CFR §§ 262.34(a)(4); 265.52(d)]. This is also a requirement of owners and operators of hazardous waste storage facilities, under WAC s. NR 664.0052(d) [40 CFR § 264.52(d)]. At the time of the inspection, Tufco failed to include home addresses and phone numbers of emergency coordinators listed in the facility's contingency plan (plan date 06/13/2013). Tufco, therefore, failed to comply with the above-mentioned condition for a storage license exemption, and violated the contingency plan requirement.

9. In order to avoid the need for a hazardous waste storage license, a large quantity generator must provide annual hazardous waste refresher training to its employees. See, WAC ss. NR 662.034(1)(d); 665.0016(3). [40 CFR §§ 262.34(a)(4); 265.16(c)]. This is also a requirement of owners and operators of hazardous waste storage facilities, under WAC s. NR 664.0016(3). [40 CFR § 264.16(c)]. At the time of the inspection, Tufco failed to provide annual hazardous waste refresher to its employees for years 2012 and 2013. Tufco, therefore, failed to comply with the above-mentioned condition for a storage license exemption, and violated the employee annual refresher training requirement.

10. In order to avoid the need for a hazardous waste storage license, a large quantity generator must maintain the following records for personnel with hazardous waste responsibilities: job title for each position, name of each employee filling each position, written job description, description of type and amount of both introductory and continuing training, and records of initial and annual training. See, WAC ss. NR 662.034(1)(d) ; 665.0016(4) [40 CFR §§ 262.34(a)(4); 265.16(d)]. This is also a requirement of owners and operators of hazardous waste storage facilities, under WAC s. NR 664.0016(4) [40 CFR § 264.16(d)]. At the time of the inspection. Tufco failed to maintain the following records for personnel with hazardous waste responsibilities: job title for each position, name of each employee filling each

position, written job description, description of type and amount of both introductory and continuing training, and records of initial and annual training. Tufco, therefore, failed to comply with the above-mentioned condition for a storage license exemption, and violated the employee training records requirement.

11. In order to avoid the need for a hazardous waste storage license, a large quantity generator using containers to accumulate hazardous may not accumulate the waste for longer than 90-days. See, WAC ss. NR 662.034(1) and (2) [40 CFR § 262.34(a) and (b)] At the time of the inspection, Tufco's container inspection records for the weeks of: 08/27/2012, 11/19/2012, 03/11/2013, 05/24/2013, and 09/02/2013 listed a container of hazardous waste with an accumulation start date of 08/27/2012. The hazardous waste container was stored in the facility's storage area for at least 371 days before being offered for disposal sometime after 09/02/2013. Tufco, therefore failed to comply with the above-mentioned conditions for a storage license exemption.

12. A small quantity generator of universal waste lamps must place used fluorescent lamps in containers that structurally sound, adequate to prevent breakage, and compatible with the contents of lamps. See, WAC s. NR 673.14(4)(a) [40 CFR § 273.13(d)(1)]. At the time of the inspection, Tufco failed to place used lamps in proper containers or packages. Used lamps stored in the facility's maintenance area were stored in a plastic container that did not wholly enclose the lamps. Tufco, therefore, violated the universal waste lamp container requirement.

13. A small quantity generator accumulating universal waste lamps in containers must label each container with the words "Universal Waste-Lamps," "Waste Lamps," or "Used Lamps." See, WAC s. NR 673.14(5) [40 CFR § 273.14(e)]. At the time of the inspection, Tufco failed to label containers (two boxes and plastic can) accumulating waste lamps in the facility's maintenance area with one of the required phrases. Tufco, therefore, violated the universal waste lamp container labeling requirement.

14. A large quantity generator who accumulates hazardous waste on-site for 90 days or fewer, and who does not meet the conditions for a license exemption set forth in WAC ss. NR 662.034(1) and (3) is an operator of a hazardous waste storage facility, and is required to obtain a hazardous waste storage license. See, WAC ss. NR 670.001(3) and NR 670.010(1) and (4) [40 CFR §§ 270.1(c), and 270.10(a), (d)]. Upon failing to comply with the conditions for a license exemption specified in paragraphs 2 through 11, above, Tufco was required to obtain a hazardous waste storage license. Tufco did not obtain a hazardous waste storage license, and, therefore, violated the licensing requirements of WAC ss. NR 670.001(3) and 670.010(1) and (4) [40 CFR §§ 270.1(c), and 270.10(a), (d)].

At this time, EPA is not requiring Tufco to apply for a hazardous waste storage license, so long as it immediately establishes compliance with the conditions for an exemption outlined above. Under Section 3008(a) of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6928(a) EPA may issue an order assessing a civil penalty for any

past or current violation requiring compliance immediately or within a specified time period. Although this letter is not such an order, you are hereby requested to submit a response in writing to this office no later than thirty (30) days after receipt of this letter documenting the actions, if any, which have been taken since the inspection to establish compliance with the above conditions and requirements.

You should submit your response to Derrick Samaranski, U.S. EPA, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604. If you have any questions regarding this letter, please contact Derrick Samaranski, of my staff at (312) 886-7812.

Sincerely,

Gary J. Victorine, Chief
RCRA Branch

Enclosures

cc: Jennifer Easterly, WDNR, Jennifer.Easterly@wisconsin.gov
Michael Ellenbecker, WDNR, Michael.Ellenbecker@wisconsin.gov

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5, LCD, RCRA BRANCH, LR-8J
77 W. JACKSON BOULEVARD
CHICAGO, IL 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

SITE NAME:	Tufco Technologies, Inc.
EPA ID No.:	WID074771908
ADDRESS:	3161 S. Ridge Road Green Bay, Wisconsin 54304
DATE OF INSPECTION:	April 29, 2014
EPA INSPECTOR:	Derrick Samaranski, LCD, RCRA, CS2

PREPARED BY: Derrick Samaranski — 06/12/14 — **Date Completed**

ACCEPTED BY: **Julie Morris, Chief**
Compliance Section 2 — 9/24/14 — **Date**

Purpose of Inspection

I conducted an unannounced Compliance Evaluation Inspection (CEI or "Inspection") of Tufco Technologies, Inc. ("Tufco" or "Facility") located in Green Bay, Wisconsin, on April 29, 2014. This CEI was an evaluation of Tufco's compliance with hazardous and universal waste regulations found at Wisconsin Administrative Code (WAC) and the Code of Federal Regulations (CFR). The RCRA CEI was led by the U.S. Environmental Protection Agency.

Participants

Inspector(s):

Derrick Samaranski, U.S. EPA
Jennifer Easterly, WDNR

Site Representatives:

Tony Aitkin, Director of Operations
Jim Robinson, President/CEO
Kim Becks, Human Resources Manager

Introduction

I arrived at the location of the Tufco facility at 8:30 AM, and proceeded to speak with Mr. Aitkin. I presented my official credentials, gave the Mr. Aitkin my business card, and explained the purpose of my visit. During the opening conference with Mr. Aitkin, I asked for a description of the Tufco's operations and a listing of solid and hazardous waste streams generated by the facility.

I informed the Tufco representatives that the facility could claim any information gathered during the inspection as Confidential Business information including: verbal information, documents and photographs. Tufco did not make a CBI claim on the information gathered during the inspection

Site Description

The following information about Tufco is based on the personal observations of the EPA inspector and on representations made during the Inspection by the Facility personnel identified above or is otherwise specified.

Tufco is a contract personal care wet and dry wipe manufacturing facility which also conducts flexographic printing and glue laminations of products. The majority (60-70%) of Tufco's production is dedicated to wipe product manufacturing with the rest going to flexographic

printing, laminations, and specialty products. Tufco changed ownership on February 24, 2014 to Griffin Holdings. Currently the facility occupies combined manufacturing space of 230,000 square feet divided between Plant 1 and Plant 2. Tufco employs 204 people operating three shifts 24 hours/5 days per week.

Most of the manufacturing at Tufco takes place in Plant 1 where the facility operates two flexographic printing lines (one solvent based and one water based), lamination operations, baby and beauty production area, and three sachet product lines (sachet#1 - #3). Plant 1 houses the facility's raw material storage and support operations which include: shipping and receiving, packaging, maintenance, two product tank farms, office space, additives mixing (since 2012), two quality control laboratories, three clipping lines, and basic waste water treatment operations. Over the last three years Tufco also ended recharge/mustang operations in Plant 1.

Plant 2 at the time of the inspection was operating a toilet cleaning line, sachet product line (sachet #4) and one clipper line. Support operations at Plant 2 involve maintenance, waste water treatment similar to Plant 1, and product storage farm which was not in use at the time of the visit.

Manufacturing operations at Tufco generate waste from manufacturing, operation of the labs, and maintenance operations. Solid waste streams include: leftover/expired/obsolete aqueous inks, adhesives, product oils, off-spec products, waste waters, cardboard, scrap metal, electronic wastes, and used rags. Hazardous waste streams include: spent solvent from the operation of the flexographic equipment and parts washers, leftover or off-spec ignitable solutions, aerosol waste, off-spec products, lab wastes, and waste solvent based inks. Tufco also generates and recycles used batteries, lamps, and lubricating oil. Hazardous wastes at Tufco are collected first in satellite containers which are then emptied into larger containers or moved to the 90-day storage area.

Site Tour

Plant 1

The site walk-through of the facility started at 10:00 AM, and began with the visit to the facility's former 90-day hazardous waste storage area and Lab #1. The former 90-day storage area was located near the flex press manufacturing area and is currently used for the storage of empty drums. Lab#1 conducts physical peel strength testing on manufactured products and as such does not generate hazardous waste.

Next, we visited the laminating operations where we looked at glue dispensing areas and a scrap metal collection container. Tufco laminates roll to roll and uses AL-1262 glue product which according to the facility representatives is not hazardous when disposed.

After visiting lamination operations, we visited the second floor retain storage area which was located above the solvent ink storage room. The solvent ink storage room was equipped with a

spill kit and a daily inventory is conducted to manage the ink products. Tufco's water based ink products are stored on ink racks located north of the laminating operation. Waste and obsolete water based inks are collected in a 55-gallon drum located near the storage racks. Two water based Aquatene parts washers were located in the ink dispensing/storage area. One of the parts washers was located near the ink room/office and the second was located near the ink dispensing unit. No hazardous wastes are generated from the ink storage or dispensing operations.

Next, we briefly visited Tufco's paper recycling/storage area, where Tufco operates a trash compactor for collection of non-hazardous solid wastes.

From the paper recycling area we proceeded to the flex press area where Tufco uses ink thinner solvents and operates a parts washer which uses basic cleaner (pH 13.0) mixed with water. The facility did not conduct a hazardous waste determination on the spent caustic parts washer fluid. To clean the press units Tufco uses clean-up solvent which is collected in a 55-gallon flow through tank which manually discharges to a 55-gallon drum. One of the press operators was asked to explain the operation of the spent solvent collection system. According to the press operator the presses are once-through flushed with solvent which is then collected in the flow through bell shaped tank. The flow through bell tank is equipped with a high level control which prevents spent solvent from overflowing in the tank. Once full the bell shaped tank is manually emptied by a press operator to a 55-gallon drum which is managed as a satellite container. At the time of our visit, I observed that the flow-through tank was labeled as "Waste Solvent Tank." The satellite drum accumulating the spent solvent was labeled as "Hazardous Waste."

Next, we visited the facility's waste water treatment tank (approx. volume of 2,000 gallons) where the waste waters are neutralized. Near the neutralization tank Tufco operates an Anilox roll blast cleaner. The spent media from the roll cleaner is managed as non-hazardous waste.

On the way to the Plant 1 maintenance area, we stopped at the roll plate mounting area where Tufco operates a satellite area for the collection of the wet disposable wipes. The wet wipes are collected in a 55-gallon drum which was closed and labeled as "Hazardous Waste." In the future Tufco will manage the wipes as non-hazardous per the new solvent wipe exemption. Outside of the maintenance area, I observed a locker which was used for the storage of solvent based inks which are used in label printing for product packaging. According to the facility representatives the label printing operation does not generate waste as the inks are completely used. In the maintenance area Tufco operates a mineral spirits parts washer, accumulates used oil, aerosol wastes, and universal waste lamps. At the time of our visit to the maintenance area, I observed three labeled 55-gallon drums of used oil, and an unlabeled 55-gallon accumulation drum of spent aerosol wastes. The aerosol waste drum had a tapped piece of paper on top of the drum which said "For Waste Paint." According to facility representatives it takes approximately a year to fill the satellite aerosol waste. Before, we left the maintenance area we looked at the facility's universal waste lamp accumulation area. I observed two open and unlabeled cardboard boxes with spent four foot lamps, and a plastic open top barrel full of spent eight and four foot fluorescent lamps. The lamps in the barrel were more than half exposed and the barrel was not

properly labeled. Before we left the area one of the facility representatives placed universal waste stickers on the two cardboard boxes with spent lamps.

From the maintenance shop, we proceeded to the facility's current 90-day hazardous waste storage room. The hazardous waste storage room was divided into two separate rooms. The first room held a number of containers (drums, boxes, pails) which were identified by the facility representatives as still usable products. The second room held four 55-gallon drums of press wash solvent waste. All four drums of press wash waste were labeled as "Hazardous Waste" and dated with accumulation start dates. The oldest accumulation start date was 04/16/2014. Near the wall I also observed one more 55-gallon drum which was labeled as "Hazardous Waste" and Waste Aerosol Drum. The drum did not have an accumulation start date.

Next, we visited Tufco's Lab #3 where the facility conducts product testing and as a result generates hazardous waste from the operation of the HPLC equipment. At the time of our visit, I observed wastes being accumulated in an open 5-gallon yellow bucket which was labeled as "HPLC Waste." According to the lab personnel it takes six months to fill the 5-gallon bucket, before it is emptied to the spent solvent drums in the 90-day storage area.
The site walk-through of Plant 1 ended with a visit to the Sachet #2 production line, where Tufco generates and accumulates hazardous waste in a cubic yard box (solid wastes) and 55-gallon drum (liquid). According to the facility representatives it takes approximately one week to fill the cardboard box, which was last disposed two months ago. At the time of our visit, the cardboard box was open and accumulating defective sachet products. It was labeled as "Hazardous Waste." In the flammable liquid satellite area of Sachet #2 line, I observed a 5-gallon open and unlabeled pail of leftover liquid waste. According to the facility representatives the liquid waste was generated that morning and was being staged to be transferred to a 55-gallon satellite drum. Before we left the area a Tufco employee brought in a labeled 55-gallon drum to transfer the liquid from the pail. The drum was labeled as "Hazardous Waste."

Plant 2

The site walk-through of the Plant 2 operations started with a visit to the Sachet #4 product line and ended with a visit to the Khan (toilet cleaning product) production area. Plant 2 operates a maintenance area, which at the time of our visit was closed. Through the chain-link fence of the maintenance area I could see a parts washer. The parts washer was identified as using the same mineral spirits solvent as the parts washer in the Plant 1 maintenance area. Outside of the maintenance shop, I observed a labeled satellite drum which was accumulating aerosol wastes. During the walk-through of the Plant 2 operations, we also visited waste water treatment tank similar in set-up to the Plant 1 waste water treatment tank, and an empty raw material tank farm. In the future Tufco expects to conduct more in-house pre-mixing of solutions to reduce production costs. The site walk-through ended at 1:00 PM.

Records Review

For the records review I requested to see the following: hazardous waste manifest records for off-site shipments for the last three years (2014 – 2011), waste stream determinations, training records, contingency plan, copies of the last three annual hazardous waste reports submitted to WDNR, weekly inspection records of the hazardous waste accumulation area, land disposal restriction forms (LDRs), universal waste shipment documents, and MSDS for select products observed during the site walk-through.

First, I reviewed Tufco's weekly inspection logs of the 90-day hazardous waste accumulation area. The weekly inspection logs were available for a time period beginning 08/27/2012 through 12/16/2013 (two sheets). No other weekly inspection records were available for my review. The weekly inspection records indicated that inspections of the hazardous waste storage area were conducted approximately once every 2-4 months. In addition, during the week of September 2, 2013, Tufco personnel noted the oldest accumulation start date on one of the drums as being 08/27/2012. The same accumulation start date was noted on the inspection records for weeks 08/27/2012, 11/19/2012, and 03/11/2013, and 05/24/2013. For the week of 12/16/2013 the oldest accumulation start date was recorded as 08/27/2013 (possible transcription error). According to the facility representatives there were no weekly inspection records for 2014.

Next, I reviewed Tufco's 2013, 2012, and 2011 annual reports, which were submitted to WDNR on 02/25/2014, 02/19/2013, and 02/22/2012, respectively. In 2011 Tufco generated 72,205 pounds of hazardous waste culminating with 2013 when it generated 104,579 pounds of hazardous waste. Based on the review of the manifest records attached to the hazardous waste reports Tufco made at least one off-site shipment of hazardous waste per month during years 2012 and 2013.

After reviewing the annual hazardous waste reports, I reviewed Tufco's waste stream determination records. I reviewed waste profiles for hazardous and non-hazardous waste streams generated by Tufco. The reviewed profiles included: off-spec baby wipe lotion (non-haz), water based ink (non-haz), unused surfactant solution (non-haz), leftover fragrances (non-haz), leftover cleaners and wipes (non-haz), disinfectant solution (D001, D002), obsolete ink (D001, D005-D008), off-spec material (D001), press wash (D001), old ink cartridges (D001), out dated glass cleaner (D001), floor dry with alcohol (D001), and left over corrosive cleaning product (D002). The waste profiles also included a profile for the universal waste lamps. I also reviewed MSDS for some of the products we observed during the walk-through: glues (AL 31-126-2 and AL 34-135-2), mineral spirits (F.P. 108°F), and solvent based label ink (3103 and 3501). Only mineral spirits are managed as hazardous waste when disposed. According to the facility labeling ink is used and not disposed. Disposed glues are non-hazardous when disposed.

Next, I reviewed a sample of inspection records Tufco employees conduct prior to offering a shipment of hazardous waste for off-site disposal. The records covered time period from 05/29/2013 to 12/27/2013 where Tufco had 14 off-site shipments.

Next, I reviewed Tufco's contingency plan which was dated 06/10/2013 and was being updated (new emergency coordinators). The current contingency plan was missing home addresses and phone numbers of the emergency coordinators.

After reviewing Tufco's contingency plan I reviewed facility's 2013-2014 manifest records, LDRs, training documents, and universal waste shipment records. Training for the employees managing hazardous waste was not provided for 2013, and records for 2012 were not available for my review at the time of the inspection. Job titles, job descriptions, and description of the amount of training required by Tufco employees managing hazardous waste at the facility was not available for my review. Tufco generates electronic scrap which it offers for off-site recycling on a regular basis. The electronic waste shipment documents reviewed included a spread sheet which covered a period from May 2011 through March of 2014. I also reviewed a similar spread sheet for the management of used fluorescent bulbs. The used fluorescent bulb records covered the period from March 2011 through February 2014. Used batteries generated at the facility are managed through Recycle America. . I requested to see a sample invoice for the shipment of e-waste, used batteries and used bulbs.

Used oil generated by Tufco is managed by Halron Oil Lubricants out of Green Bay, Wisconsin. No used oil shipment documents were available for my review.

Closing Conference

For the inspection close-out conference I requested Tufco facility representatives to provide me with copies of documents which were not readily available during the inspection. I gave the facility representative Small Business Resource Sheet and Wisconsin's Solid and Hazardous Waste Education Center (SHWEC) handout. During the closeout conference, I discussed labeling requirements for satellite containers, training, and universal waste records. The inspection of the facility ended at 5:34 PM.

Follow-up

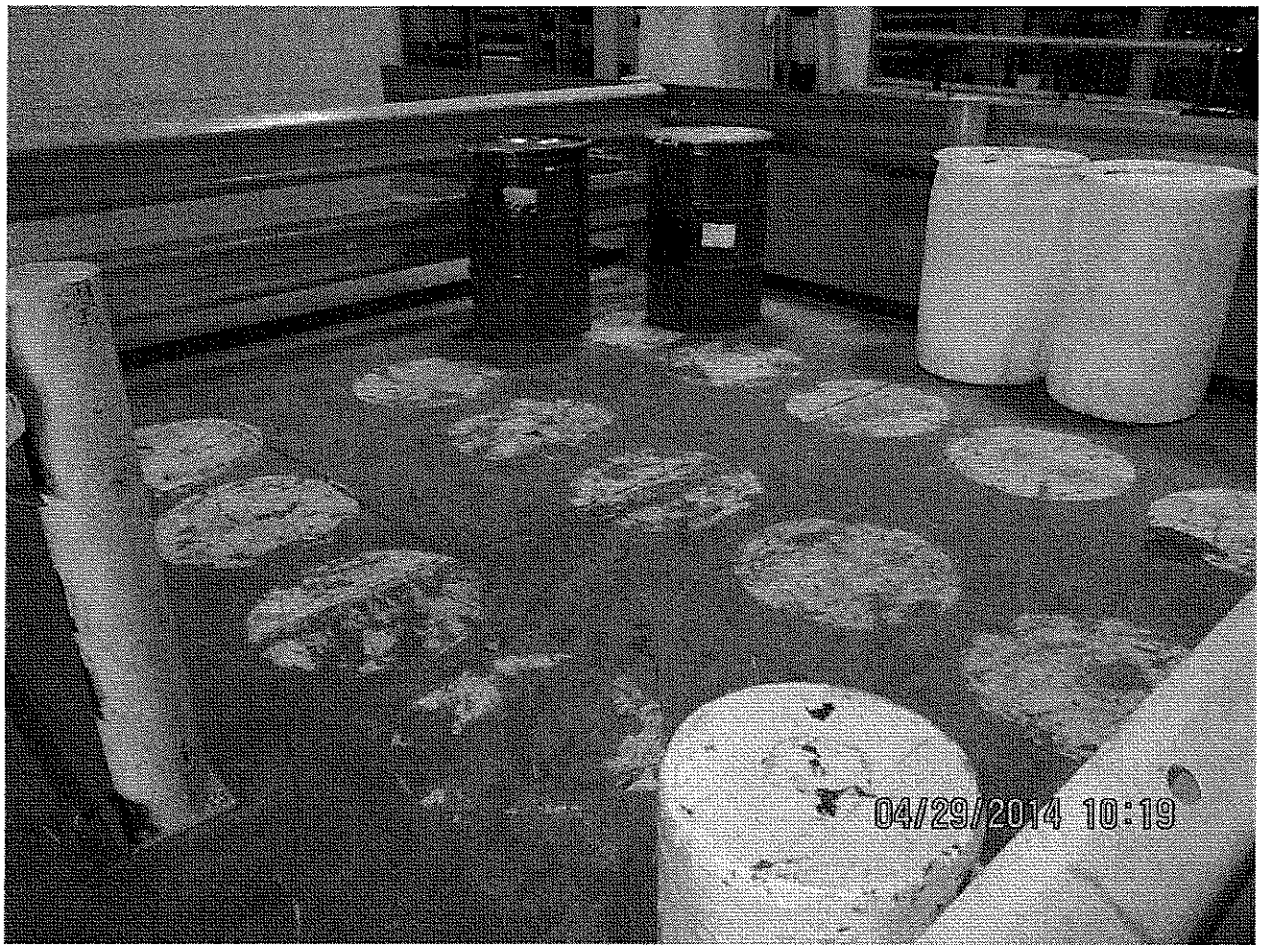
On May 2 and 16, 2014, Mr. Aitkin e-mailed me: copies of the LDRs of all waste streams offered for disposal to Hydrite Chemical Co., Spills Response Services Agreement between Tufco and North Shore Environmental Construction, Inc., copy of manifest 006557354FLE which Tufco failed to send to WDNR and an attached certificate of disposal, waste profile for the aerosol waste (05/06/2014), receipt for used oil pick-up from Halron Lubricants, Inc., photos of corrections made during and after inspection of issues noted during the inspection.

Attachments

A. Photographs
B. Checklists
C. List of Documents Copied/Obtained During Inspection
D. CD of All Photos Taken During the Inspection

ATTACHMENT A
Photographs

Tufco Technologies, Inc.
WID0074771908

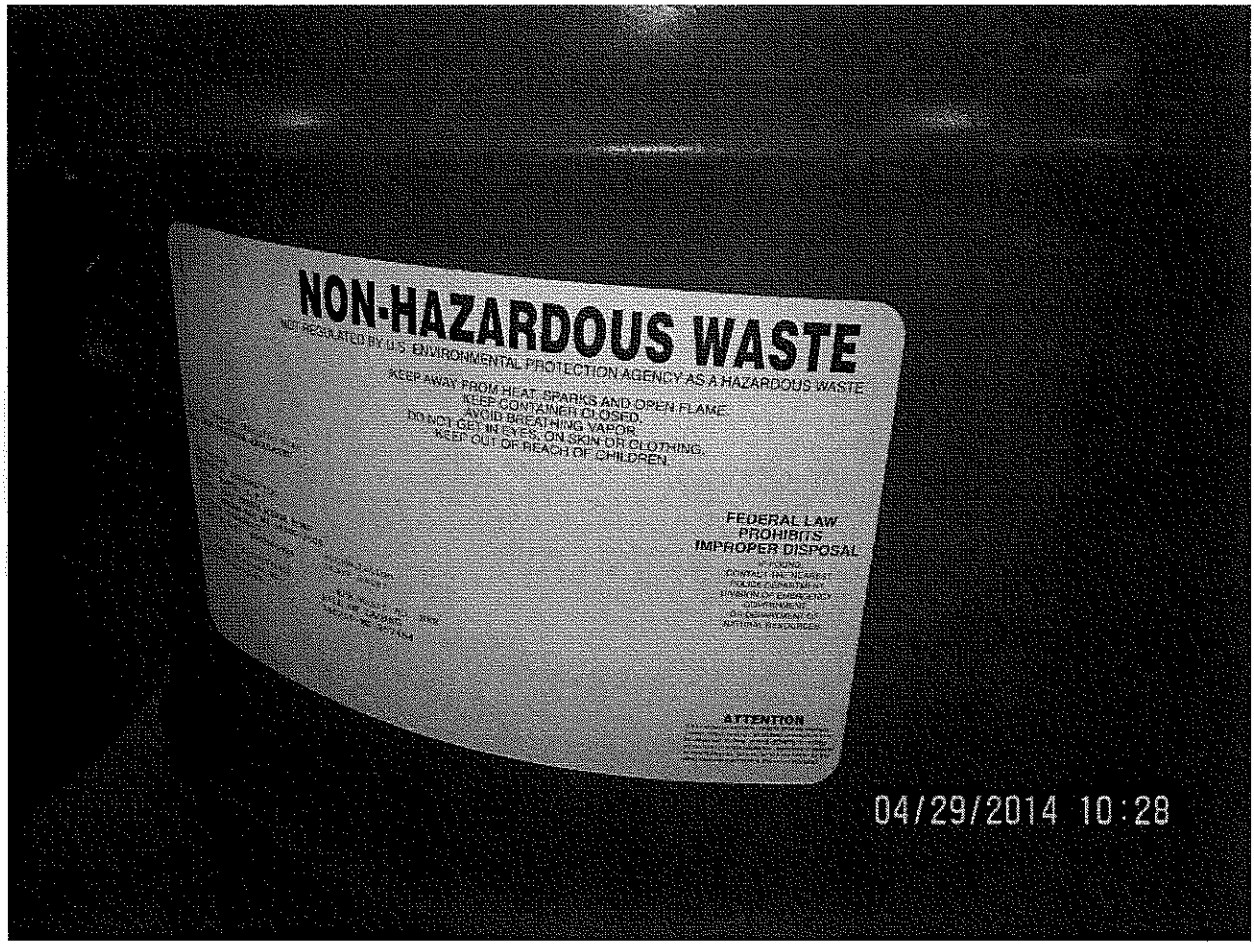


Photograph Number: 1

Photographer: Derrick Samaranski

Photograph Description: Tufco's former 90-day hazardous waste storage area currently used for the storage of empty containers.

Tufco Technologies, Inc.
WID0074771908

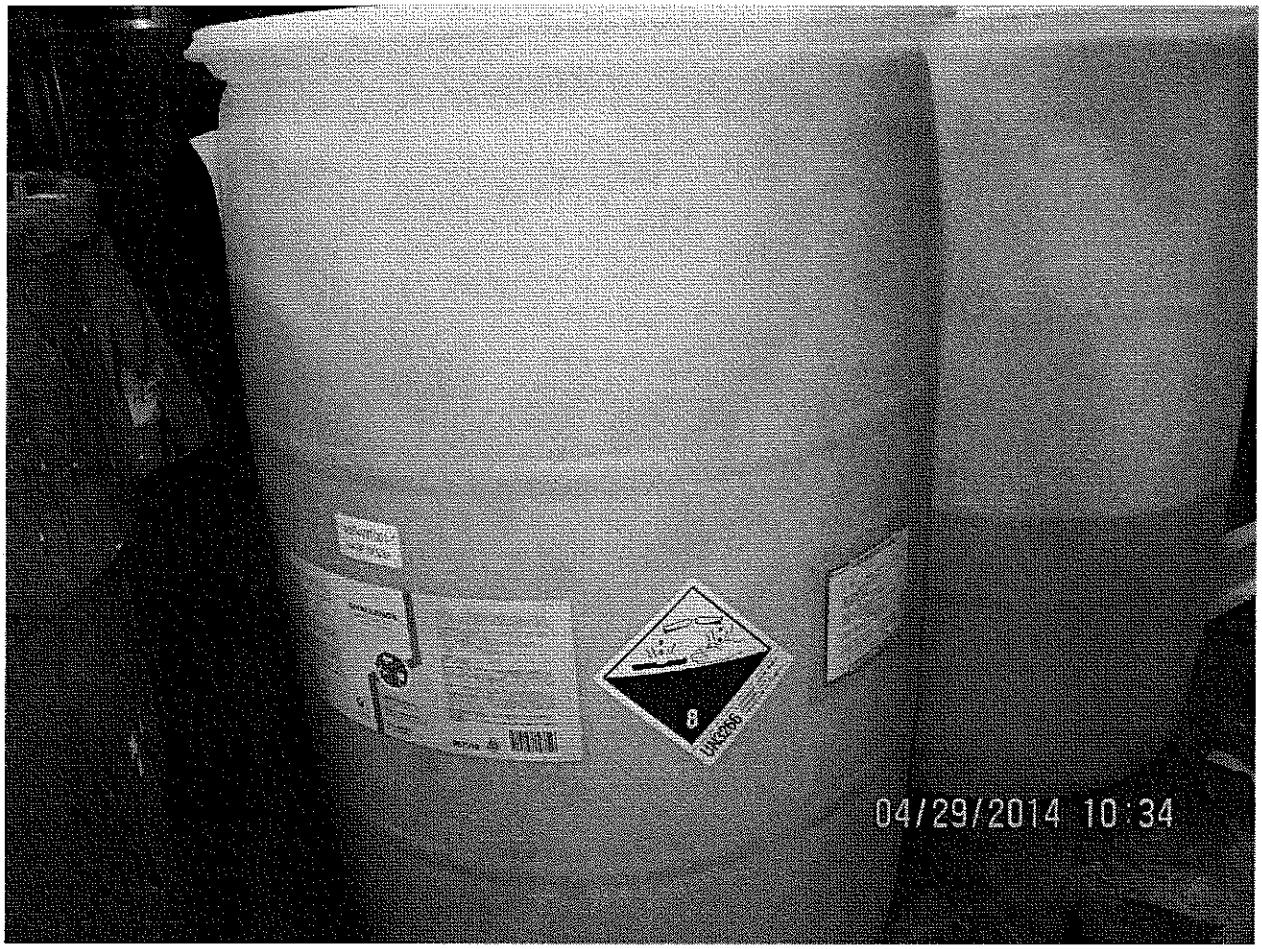


Photograph Number: 2

Photographer: Derrick Samaranski

Photograph Description: Label on a drum used for the collection of the aqueous inks. Drum located next to the ink racks.

Tufco Technologies, Inc.
WID0074771908

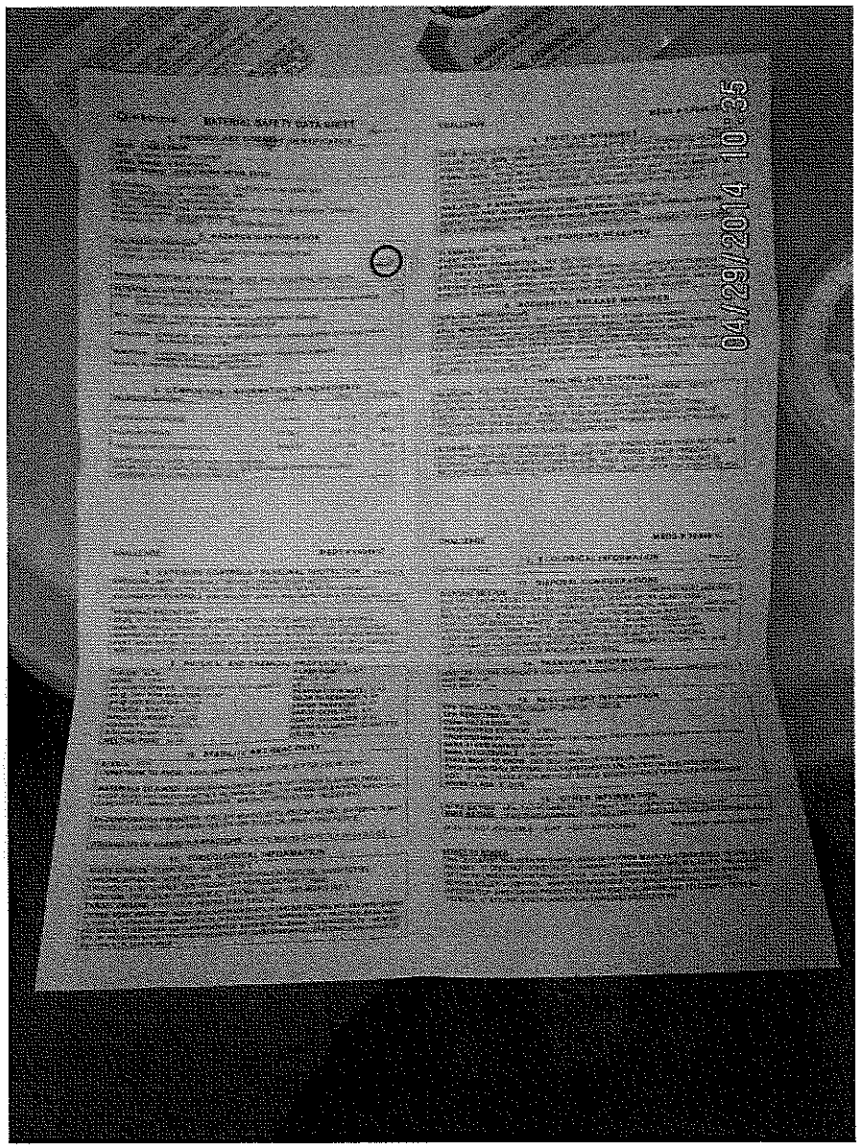


Photograph Number: 3

Photographer: Derrick Samaranski

Photograph Description: Drum of corrosive cleaner that is used in the flexographic printing area parts washer. Currently treated in the facility's waste water treatment tank (Plant 1).

Tufco Technologies, Inc.
WID0074771908

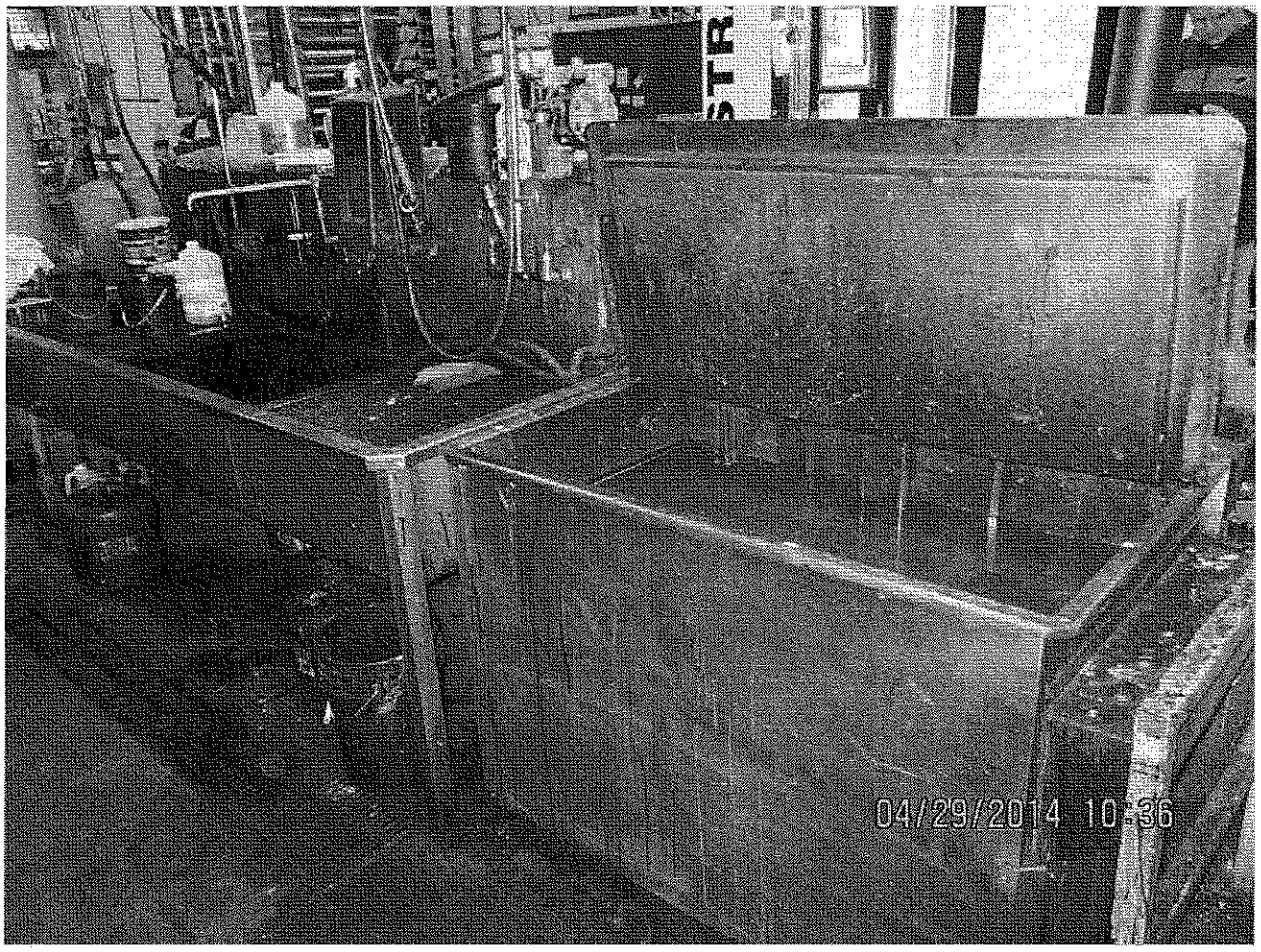


Photograph Number: 4

Photographer: Derrick Samaranski

Photograph Description: Close-up of the MSDS for the cleaner drum pictured in photo #3.

Tufco Technologies, Inc.
WID0074771908

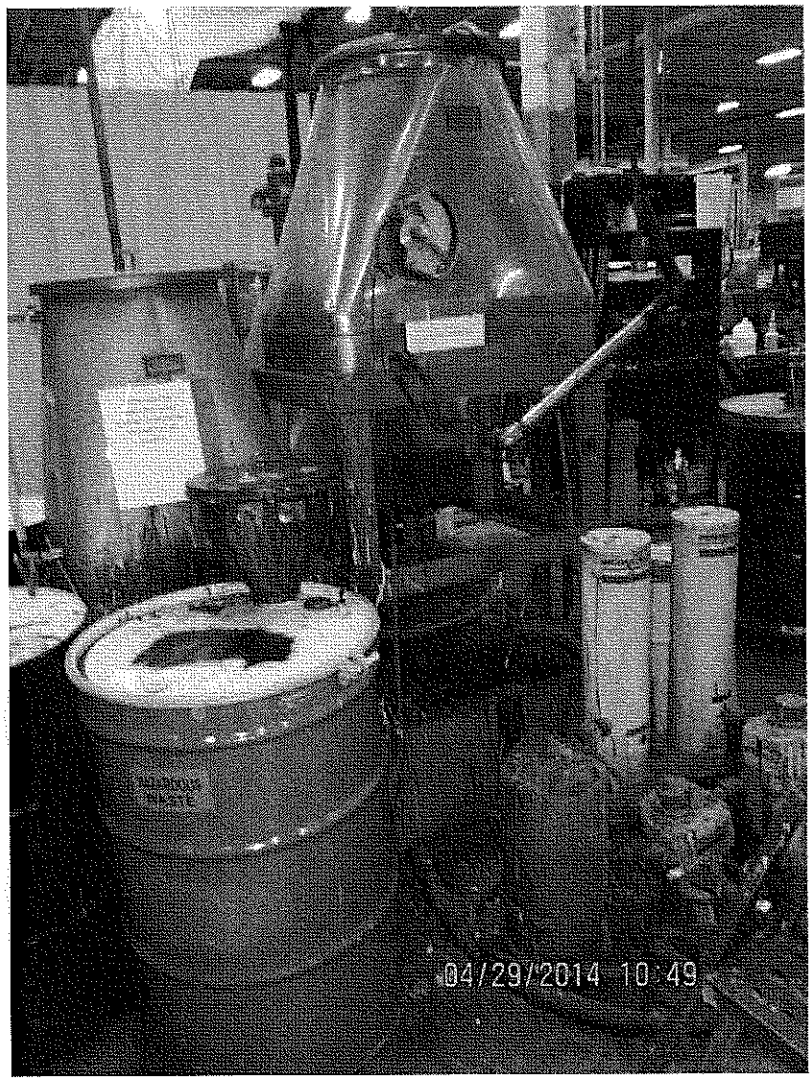


Photograph Number: 5

Photographer: Derrick Samaranski

Photograph Description: Parts washer using the cleaner pictured in photo #3.

Tufco Technologies, Inc.
WID0074771908



Photograph Number: 6

Photographer: Derrick Samaranski

Photograph Description: Spent press wash solvent collection area: 55-gallon overfill tank and 55-gallon collection drum.

Tufco Technologies, Inc.
WID0074771908

Photograph Number: 7

Photographer: Derrick Samaranski

Photograph Description: Close-up of the overfill tank accumulating spent solvent from the press wash.

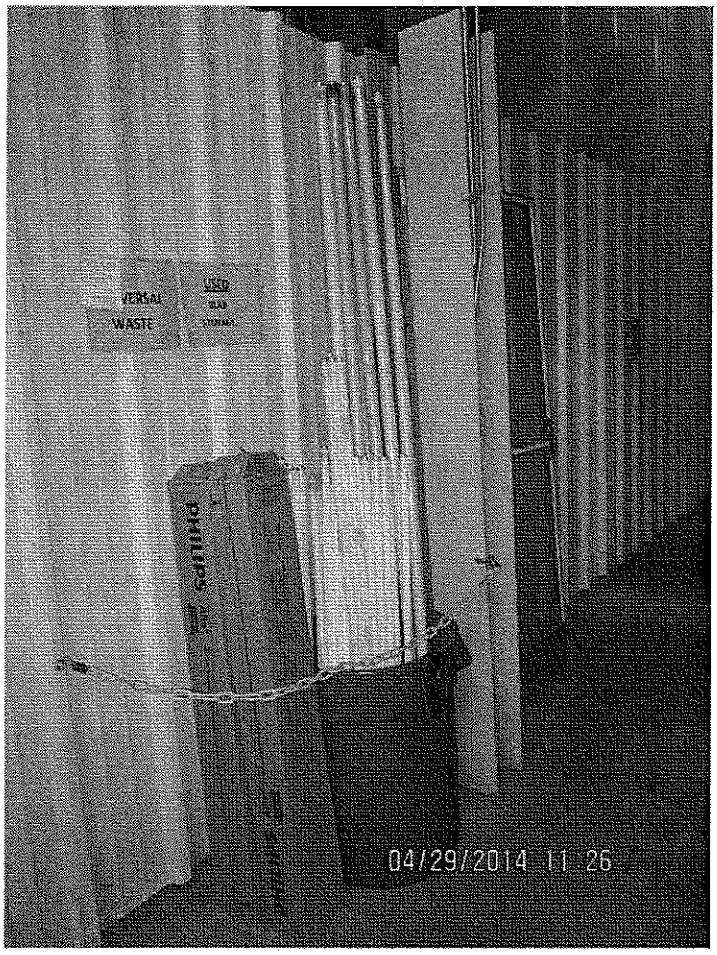
Tufco Technologies, Inc.
WID0074771908

Photograph Number: 8

Photographer: Derrick Samaranski

Photograph Description: Unlabeled 55-gallon satellite drum accumulating spent aerosol waste in the Tufco maintenance shop Plant 1.

Tufco Technologies, Inc.
WID0074771908



Photograph Number: 9

Photographer: Derrick Samaranski

Photograph Description: Improperly stored 8 foot used lamps and unlabeled boxes of the 4 foot used lamps in the facility's Plant 1 maintenance shop.

Photograph Number: 10

Photographer: Derrick Samaranski

Photograph Description: Container of aerosol waste in the 90-day storage area missing accumulation start date.

Tufco Technologies, Inc.
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Photograph Number: 11

Photographer: Derrick Samaranski

Photograph Description: Close-up of the label on the drum of waste aerosol picture in photo#10.

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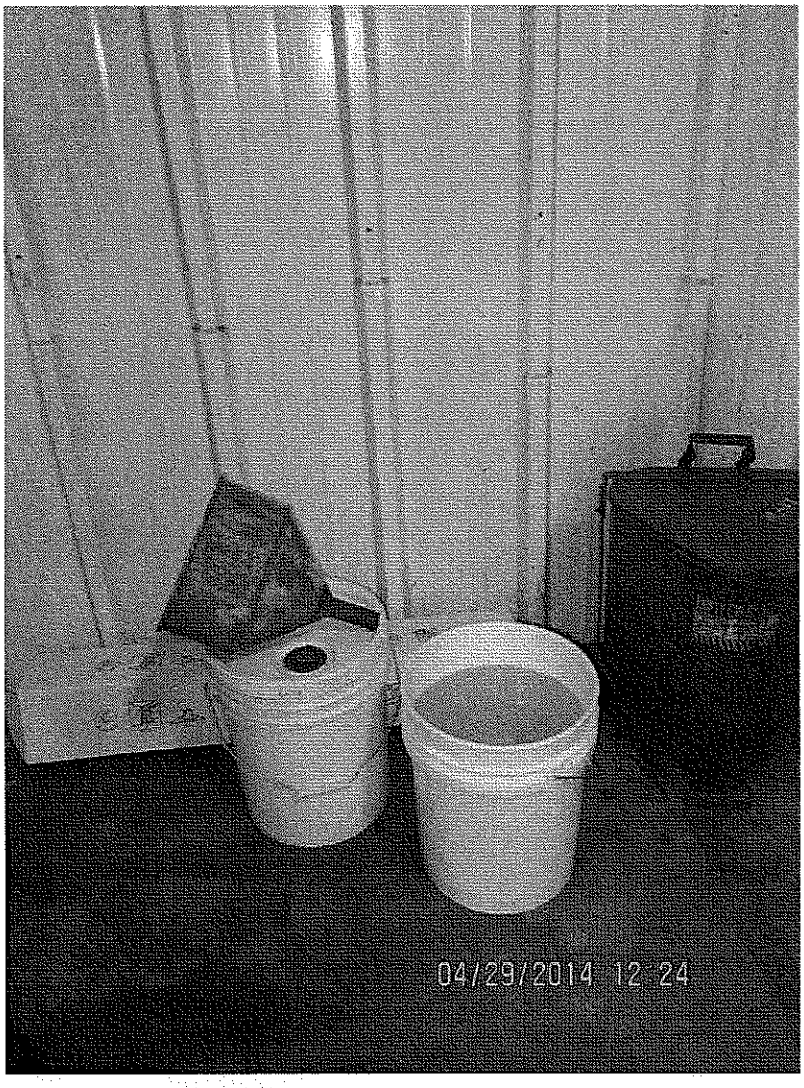
WID0074771908

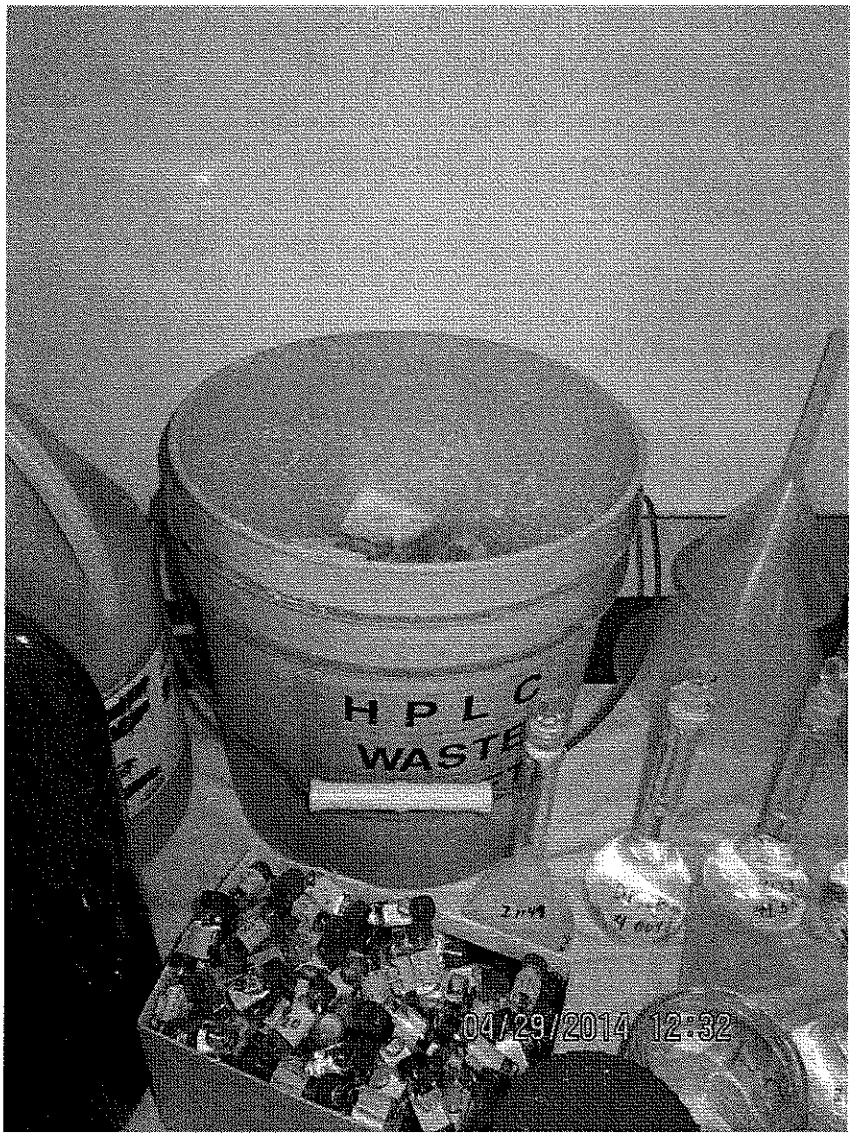


Photograph Number: 12

Photographer: Derrick Samaranski

Photograph Description: Satellite container accumulating waste ignitable product in the sachet#2 line open and missing labeling.

Tufco Technologies, Inc.
WID0074771908

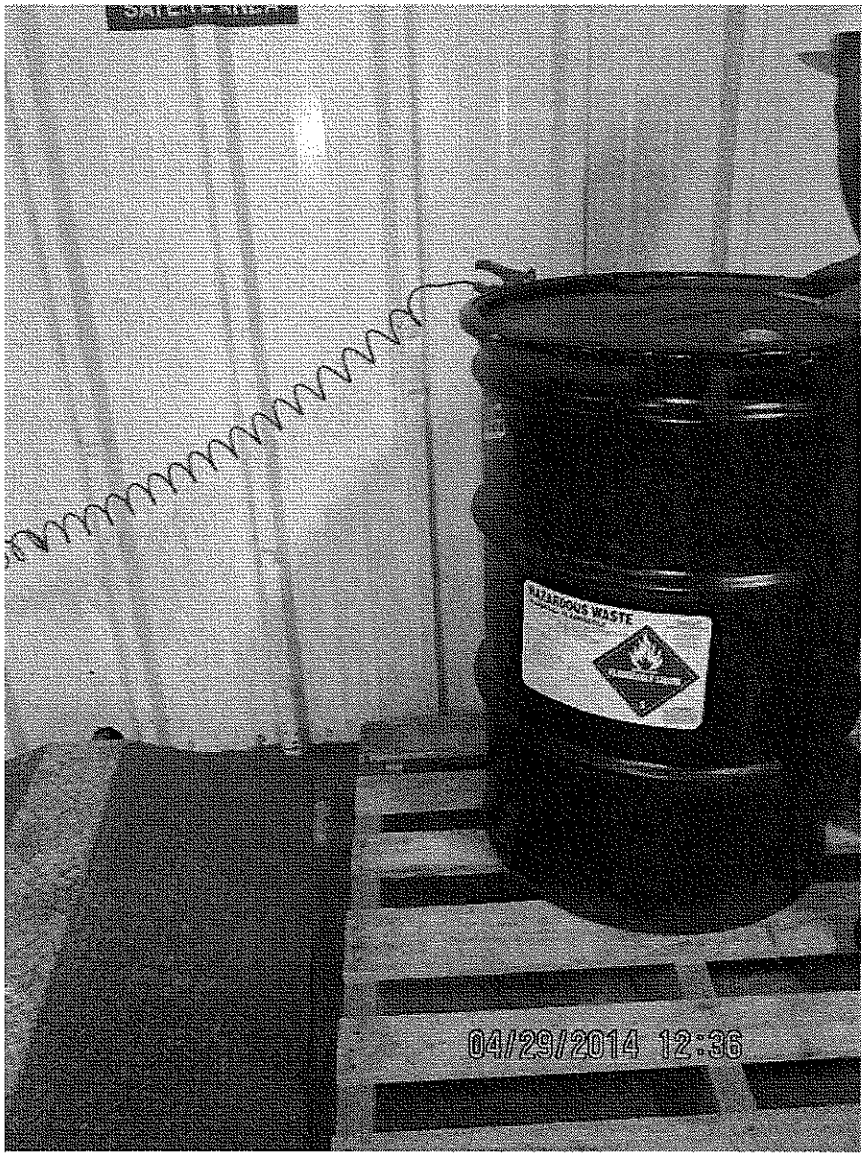


Photograph Number: 13

Photographer: Derrick Samaranski

Photograph Description: Open satellite container of hazardous lab waste in lab #3.

Tufco Technologies, Inc.
WID0074771908



Photograph Number: 14

Photographer: Derrick Samaranski

Photograph Description: Satellite container accumulating ignitable waste in the sachet#2 line. Area previously pictured in photo #12.

ATTACHMENT C
Documents Copied

Document	Date
Copy of Two Hazardous Waste Manifests and LDRs for off-site shipments to Tradebe (0009648242JJK, 009975173JJK)	04/29/2014
Copy of the pages 2 and 3 of the Tufco's Contingency Plan	04/29/2014
Copy of Two Certificates of Disposal of non-hazardous liquids to Elite Environmental September and July of 2013	04/29/2014
Copy of Waste Determinations for: off-spec baby wipe lotion, water based ink, unused surfactant solution, leftover fragrances, leftover cleaners and wipes, disinfectant solution (D001, D002), obsolete ink (D001, D005-D008), off-spec material (D001), press wash (D001), old ink cartridges (D001), out dated glass cleaner (D001), floor dry with alcohol (D001),corrosive cleaning product (D002), universal waste lamps	04/29/2014
Copy of the Table of HW Shipments of the 2012 Annual Hazardous Waste Report	04/29/2014
Copy of the Summary and Table of HW Shipments of the 2013 Annual Hazardous Waste Report	04/29/2014
Copy of the Weekly Inspection Logs (08/27/12 -12/16/13)	04/29/2014
Copy of Xcel Spread sheet of Outgoing Universal Wastes (03/2011-02/2014)	04/29/2014
Copy of the Facility Layout Plant 1 and 2)	04/29/2014

Section 15: Used Oil

G. If used oil is burned in an on-site used oil-fired space heater, all of the following are met: 1. Only used oil from the generator or household do-it-yourselfers is burned. 2. The heater is designed with a maximum capacity of 0.5 million BTU per hour or less. 3. The combustion gases are vented to the ambient air.	N/A	679.23 Photo☐
H. If used oil is accepted from others or sent off-site to be burned in a space heater, the used oil meets fuel specifications and the marketer requirements in NR 679 subch. H are met.	N/A	679.11 Photo☐

Section 16: F006 Wastewater Treatment Sludge

A. Generator accumulates F006 sludge for more than 90 days. If NO, go to Section 17.	N	 Photo☐
B. The F006 waste is accumulated for no more than 180 days, unless the waste is shipped 200 miles or more.		662.034(7) Photo☐
C. Pollution prevention practices are in place to reduce the amount of contaminants entering the F006 waste.		662.034(7)(a) Photo☐
D. The F006 waste is legitimately recycled through metals recovery.		662.034(7)(b) Photo☐
E. No more than 20,000 kg (44,100 lbs) of F006 waste is accumulated on-site.		662.034(7)(c) Photo☐
F. Accumulation containers meet subch. I, AA, BB and CC standards in ch. NR 665.		662.034(7)(d)1.a Photo☐
G. The accumulation start date is clearly marked and visible for inspection on each container.		662.034(7)(d)3 Photo☐
H. Accumulation tanks meet subch. J, AA, BB and CC standards in ch. NR 665, except for NR 665.0197(3) and NR 665.0200.		662.034(7)(d)1.b Photo☐
I. Each container and tank of F006 waste is clearly marked with the words "Hazardous Waste".		662.034(7)(d)4 Photo☐
J. A containment building used for accumulation meets subch. DD standards in ch. NR 665; a P.E. certification stating compliance with the design standards is in the operating record AND written procedures and documentation for emptying the unit within 180 days are on file.		662.034(7)(d)1.c Photo☐
K. The accumulation of F006 waste is included in the preparedness and prevention procedures, contingency plan and personnel training program.		662.034(7)(d)5 Photo☐
L. If waste is accumulated for up to 270 days, the generator must ship the waste over 200 miles for metals recovery.		662.034(8) Photo☐

Section 13: Satellite Accumulation

E. If a container is leaking or in poor condition, the contents are transferred to another container in good condition (NR 665.0171).	Y	662.034(3)(a)1 Photo☐
F. Containers are kept closed except when it is necessary to add or remove waste (NR 665.0173(1)).	N	662.034(3)(a)1 Photo☐
G. Containers are marked "Hazardous Waste" or with other words that identify the contents.	N	662.034(3)(a)2 Photo☐
H. Container holding the excess waste is marked with the date the excess amount begins accumulating.	Y	662.034(3)(b) Photo☐
I. Generator complies with the 90 day accumulation requirements with respect to the excess amount within 3 days of it being generated.	Y	662.034(3)(b) Photo☐

Section 14: Waste Minimization

A. Generator includes waste minimization information in the annual report.	Y	662.041(3)(e) Photo☐
B. Generator has a program in place to reduce the volume or quantity and toxicity of waste to an economically practicable degree. Note: The inspector should look for evidence justifying the generator's waste minimization certification on the manifest. Also, EPA guidance recommends that the generator have a written waste minimization/pollution prevention plan.	Y	662.027(1) Photo☐

Section 15: Used Oil

Hudson, Green Bay.

A. Used oil is managed on-site. If NO, go to Section 16	Y	 Photo☐
B. Used oil containing >= 1,000 ppm halogens is managed as listed hazardous waste or the rebuttable presumption requirements have been met.	N/A	679.10(2)(a)2 Photo☐
C. Used oil containers and tanks are in good condition and not leaking.	N/A	679.22(2) Photo☐
D. Used oil containers and tanks are marked "used oil".	N/A	679.22(3)(a) Photo☐
E. Transporter has an EPA ID number, except when generator self-transports or has a tolling agreement.	N/A	679.24 Photo☐
F. Used automotive oil filters and oil absorbent material are not land filled, except if less than 1 gallon absorbent results from a non-routine spill.	N/A	 Photo☐

Section 11: Subchapter CC Level 2 Container Standards

J. If the container is equipped with a pressure relief device that vents to the atmosphere, the device meets ALL of the following conditions: (NR 665.1087(4)(c)4.) 1. Designed to operate with no detectable organic emissions when in the closed position. 2. Closed when the internal pressure is within the specified operating range. 3. Opens and vents to the atmosphere only for the purpose of maintaining internal pressure according to the design specifications.		662.034(1)(a)2 Photo☐
K. Safety valves are only opened to avoid an unsafe condition. (NR 665.1087(4)(c)5.)		662.034(1)(a)2 Photo☐
L. When a defect is detected, initial repair efforts are made within 24 hours of detection. (NR 665.1087(4)(d)3.)		662.034(1)(a)2 Photo☐
M. Repairs are completed within 5 days, or the waste is removed from the container which is not used until the defect is repaired. (NR 665.1087(4)(d)3.)		662.034(1)(a)2 Photo☐

Section 12: Subchapter CC Level 3 Container Standards

A. The facility manages hazardous waste in containers having a design capacity >26 gallons during a waste stabilization process when hazardous waste is exposed to the atmosphere. If NO, go to Section 13.	N	Photo☐
B. The container is vented directly through a closed-vent system to a control device, or the container is vented inside an enclosure which is exhausted through a closed-vent system to a control device. (NR 665.1087(5)(a))		662.034(1)(a)2 Photo☐
C. If the container is vented inside an enclosure, the enclosure is operated according to the criteria for permanent total enclosures found in Method 204 in appendix M of 40 CFR part 51. (NR 665.1087(5)(b)1.)		662.034(1)(a)2 Photo☐
D. Records for the most recent set of calculations and measurements verifying the enclosure meets the criteria for a permanent total enclosure in Method 204 in appendix M of 40 CFR part 51 are maintained at the facility. (NR 665.1090(4)(a))		662.034(1)(a)2 Photo☐
E. Level 3 controls are used when wastes are transferred in or out of the container that minimize exposure to the atmosphere (e.g., submerged-fill pipe, vapor-recovery system, etc.) to the extent practical, considering the physical properties of the hazardous waste and good engineering and safety practices. (NR 665.1087(5)(f))		662.034(1)(a)2 Photo☐

Section 13: Satellite Accumulation

A. Waste is accumulated in satellite accumulation areas. If NO, go to Section 14.	Y	Photo☐
B. Generator accumulates no more than 55 gallons of hazardous waste or 1 quart of acute hazardous waste in each satellite area.	Y	662.034(3)(a) Photo☐
C. Satellite containers are under the control of the operator of the process generating the waste.	Y	662.034(3)(a) Photo☐
D. Containers are made of or lined with materials that are compatible with the waste (NR 665.0172).	Y	662.034(3)(a)1 Photo☐

Section 10: Subchapter CC Level 1 Container Standards

Q. If repairs cannot be completed in 5 days of detecting the defect, the waste is removed from the container which is not used until it is repaired (NR 665.1087(3)(d)3).	Y	662.034(1)(a)1 Photo ☐

Section 11: Subchapter CC Level 2 Container Standards

A. The facility manages hazardous waste containers with a design capacity >119 gallons that are in light material service. If NO, go to Section 12.	N	 Photo ☐
B. Any of the following controls are used on Level 2 containers: (NR 665.1087(4)(a)) 1. Container meets applicable US DOT packaging requirements. 2. Each potential leak interface where organic vapor leakage could occur on the container, cover and closure device has been checked to determine that no detectable organic emissions (< 500 ppmv) are occurring. 3. The facility has demonstrated within the last 12 months that the containers are vapor-tight using Method 27 in appendix A of 40 CFR part 60.		662.034(1)(a)2 Photo ☐
C. If the potential leak interface on the containers were checked, BOTH of the following were met: (NR 665.1087(4)(a)) 1. Checks were made on the interface of the cover rim and the container wall; the periphery of any opening on the container or container cover and its associated closure device; and, the sealing seat interface on a spring-loaded, pressure-relief valve. 2. The test was performed when the container was filled with a material having a VO concentration representative of the hazardous waste expected to be stored in the container.		662.034(1)(a)2 Photo ☐
D. The facility maintains a copy of the procedure used to determine that containers >119 gallons in size that do not meet DOT requirements are not managing hazardous waste in light material service. (NR 665.1087(3)(e))		662.034(1)(a)2 Photo ☐
E. Level 2 controls are used when transferring waste in or out of the container that minimize exposure to the atmosphere (submerged-fill pipe, vapor-recovery system, etc.) to the extent practical, considering the physical properties of the hazardous waste and good engineering and safety practices. (NR 665.1087(4)(b))		662.034(1)(a)2 Photo ☐
F. If the container is filled to the final level in one continuous operation, the closure devices are promptly secured in the closed position when the filling operation is concluded. (NR 665.1087(4)(c)1.a.)		662.034(1)(a)2 Photo ☐
G. If the container is batch filled, the closure devices are promptly secured in a closed position upon filling the container to the intended final level, or when the batch loading is completed and ANY of the following first occurs: (NR 665.1087(4)(c)1.b.) 1. No additional material will be added within 15 minutes. 2. The person performing the loading operation leaves the immediate vicinity of the container. 3. The process generating the waste shuts down.		662.034(1)(a)2 Photo ☐
H. If containers are opened to remove hazardous waste, closure devices are secured in the closed position upon completion of a batch removal and either of the following first occurs: (NR 665.1087(4)(c)2.b.) 1. No additional materials will be removed within 15 minutes. 2. The person removing the waste leaves the immediate vicinity of the container.		662.034(1)(a)2 Photo ☐
I. If access to the inside of the container is needed to perform routine activities other than the transfer of hazardous waste (e.g., sampling), the closure device is secured in the closed position promptly after completing the activity. (NR 665.1087(4)(c)3.)		662.034(1)(a)2 Photo ☐

Section 10: Subchapter CC Level 1 Container Standards

F. Containers are excluded from subch. CC because BOTH of the following are met (NR 665.1080(2), NR 665.1090.(10)): 1. They are equipped with air emission controls operated in accordance with the Clean Air Act requirements. 2. Facility records include certification of such by the owner or operator and the specific air program compliance requirements for the containers		Photo☐
G. All containers are excluded from subch. CC Level 1 standards. If YES, go to Question 10.R.	N	Photo☐
H. Any of the following controls are used on all Level 1 containers (NR 665.1087(3)(a)): 1. Container meets applicable US DOT packaging requirements. 2. A cover and closure devices form a continuous barrier over the container openings such that when they are secured, there are no visible holes, gaps or other open spaces into the container. 3. An organic-vapor suppressing barrier is placed on or over the hazardous waste in an open-top container so that the hazardous waste is not exposed to the atmosphere. Note: Level 1 standards do not apply to satellite accumulation or RCRA empty containers.	Y	662.034(1)(a)1 Photo☐
I. If Level 1 containers do not meet applicable US DOT packaging requirements, they are equipped with covers and closure devices composed of suitable materials that minimize exposure of hazardous waste to the atmosphere and maintain integrity of the covers and closure devices (NR 665.1087(3)(b)).	N/A	662.034(1)(a)1 Photo☐
J. If a Level 1 container is filled to the final level in one continuous operation, the closure device is promptly secured in the closed position when the filling operation is concluded (NR 665.1087(3)(c)1.a).	Y	662.034(1)(a)1 Photo☐
K. If a Level 1 container is batch filled, the closure device is promptly secured in a closed position when the container is filled to the intended final level OR the batch loading is completed and any of the following first occurs (NR 665.1087(3)(c)1.b): 1. No additional material will be added within 15 minutes. 2. The person performing the loading operation leaves the immediate vicinity of the container. 3. The process generating the waste shuts down.	Y	662.034(1)(a)1 Photo☐
L. If a Level 1 container is opened to remove hazardous waste, the closure device is secured in the closed position upon completion of a batch removal AND when either of the following first occurs (NR 665.1087(3)(c)2b): 1. No additional materials will be removed within 15 minutes. 2. The person removing the waste leaves the immediate vicinity of the container.	Y	662.034(1)(a)1 Photo☐
M. If access to the inside of a Level 1 container is needed to perform routine activities other than the transfer of hazardous waste (e.g., sampling), the closure device is secured in the closed position promptly after completing the activity (NR 665.1087(3)(c)3).	Y	662.034(1)(a)1 Photo☐
N. If a Level 1 container is equipped with a pressure relief device that vents to the atmosphere, ALL of the following conditions are met (NR 665.1087(3)(c)4): 1. The device is designed to operate with no detectable organic emissions (< 500 ppmv) when in the closed position. 2. The device is closed when the internal pressure is within the specified operating range. 3. The device opens and vents to the atmosphere only for the purpose of maintaining internal pressure according to the design specifications.	N/A	662.034(1)(a)1 Photo☐
O. Safety valves are only opened to avoid an unsafe condition (NR 665.1087(3)(c)5).	N/A	662.034(1)(a)1 Photo☐
P. When a defect is detected, initial repair efforts are made within 24 hours of detection and completed within 5 calendar days (NR 665.1087(3)(d)3).	Y	662.034(1)(a)1 Photo☐

Section 9: Subchapter BB Standards for Equipment Leaks

E. ALL of the following information used to determine the applicability of exclusions in Questions 9.B. - 9.D. is maintained at the facility (NR 665.1064(11)): 1. Analysis determining the design capacity of the hazardous waste management unit. 2. Statement listing the hazardous waste influent to and effluent from each hazardous waste management unit subject to subch. BB and an analysis determining whether these hazardous wastes are heavy liquids. 3. Up-to-date analysis and the supporting information used to determine whether or not equipment is subject to subch. BB.		662.034(1)(a) Photo☐
F. When knowledge of the nature of the hazardous waste stream or the process by which it was produced is used to determine the applicability of the exclusions, supporting documentation such as the following are maintained at the facility (NR 665.1064(11)): 1. Information that the production process does not use organic compounds. 2. The process is identical to a process at another facility where the total organic content was measured at <10%. 3. The process has not changed to affect the total organic concentration of the waste.		662.034(1)(a) Photo☐
G. The facility keeps records of new determinations performed when there are any changes that could result in an increase in the total organic content of the waste in contact with equipment that is not subject to subch. BB requirements (NR 665.1064(11)).		662.034(1)(a) Photo☐
H. All equipment stated in Question 9.A. is excluded from additional subch. BB requirements. If NO, complete the subch. BB inspection form.		 Photo☐

Section 10: Subchapter CC Level 1 Container Standards

A. The facility manages hazardous waste in containers with EITHER of the following design capacities. If NO, go to Question 10.R. (NR 665.1087(2)(a), NR 662.034(1)(a)1). 1. Between 26 and 119 gallons. 2. Greater than 119 gallons and not in light material service.	Y	 Photo☐
B. Containers are exempt from CC regulation because of ALL of the following (NR 662.034(1)(a)1, NR 665.1083(3)(a), NR 665.1084(1)(a)1, NR 665.1083(3)(a), NR 665.1084(1)(a)2., NR 665.1084(1)(b)): 1. The average VO concentration at the point of origination is <500 ppmw for all hazardous waste entering the container. 2. The initial determination of the average VO concentration for the waste stream was made before the material was placed in the container. 3. The initial determination is reviewed and updated at least once every 12 months. 4. A new waste determination is performed whenever changes to the source generating the waste stream likely causes the average VO concentration to increase to >= 500 ppmw. 5. The average VO concentration is determined by direct measurement or by knowledge. Note: See NR 665.1084(1)(c) for direct measurement procedures and NR 665.1084(1)(d) for using knowledge.	N	 Photo☐
C. For each waste determination, the date, time, and location of each waste sample collected are maintained in the facility records (NR 665.1090(6)(a)).	N/A	662.034(1)(a)1 Photo☐
D. Containers are excluded from subch. CC because they are used to store or treat hazardous waste from organic peroxide manufacturing processes (NR 662.034(1)(a)1, NR 665.1080(4)). Note: Certain records are to be maintained. Refer to 665.1090(9) for more information.	N/A	 Photo☐
E. Containers are excluded from subch. CC because they are used solely to store or treat EITHER of the following (NR 662.034(1)(a)1, NR 665.1080(2), NR 665.1090(10)): 1. On-site remediation wastes generated through NR 700 or RCRA corrective action activities. 2. Radioactive mixed wastes in accordance with NRC requirements	N	 Photo☐

Section 8: 90-Day Container Accumulation

D. If container is leaking or in poor condition, the contents are transferred to another container in good condition (NR 665.0171).	N/A	662.034(1)(a)1 Photo☐
E. Containers are made of or lined with materials that are compatible with the waste (NR 665.0172).	Y	662.034(1)(a)1 Photo☐
F. Containers are kept closed, except when it is necessary to add or remove waste (NR 665.0173(1)).	Y	662.034(1)(a)1 Photo☐
G. Containers are opened, handled or stored to prevent leaks or ruptures (NR 665.0173(2)).	Y	662.034(1)(a)1 Photo☐
H. Container storage areas are inspected weekly for leaks and deterioration (NR 665.0174).	N	662.034(1)(a)1 Photo☐
I. Containers of ignitable or reactive waste are located at least 50 feet from the property line (NR 665.0176).	Y	662.034(1)(a)1 Photo☐
J. Containers of incompatible wastes are separated or protected from each other by a physical barrier (dike, berm, wall or other device) (NR 665.0177(3)).	Y	662.034(1)(a)1 Photo☐
K. Incompatible wastes are stored in separate containers unless the mixing will not generate extreme heat, fire, explosion, toxic gases or other dangers (NR 665.0177(1)).	Y	662.034(1)(a)1 Photo☐
L. Containers that previously held waste are properly washed before adding incompatible waste, unless the mixing will not generate extreme heat, fire, explosion, toxic gases or other dangers (NR 665.0177(2)).	N/A	662.034(1)(a)1 Photo☐

Section 9: Subchapter BB Standards for Equipment Leaks

A. Generator operates any of the following equipment containing or contacting hazardous wastes with organic concentration >= 10% by weight. If NO, go to Section 10 (NR 662.034(1)(a), NR 665.1050(2). 1. Pumps in light liquid service. 2. Compressors. 3. Pressure relief devices in gas or vapor service. 4. Sampling connection systems. 5. Open-ended valves or lines. 6. Valves in gas or vapor service or in light liquid service. 7. Pumps or valves in heavy liquid service 8. Pressure relief devices in light liquid or heavy liquid service. 9. Flanges or other connectors.	N	Photo☐
B. Equipment listed in Question 9.A. is excluded from subch. BB requirements because it is in vacuum service and individually listed in the facility operating record by an identification number (NR 665.1050(4), NR 665.1064(7)(e)).		662.034(1)(a) Photo☐
C. Equipment listed in Question 9.A. is excluded from subch. BB requirements because it operates < 300 hours per calendar year and is identified, either by list or location (area or group), in the facility operating record. (NR 665.1050(5), NR 665.1064(7)(f)).		662.034(1)(a) Photo☐
D. If the facility determines compliance with subch. BB by documenting compliance with Clean Air Act requirements, the documentation is readily available as part of the operating record (NR 665.1064(13)).		662.034(1)(a) Photo☐

Section 7: Personnel Training Requirements

A. Generator has a program of classroom instruction or on-the-job training for personnel in hazardous waste management (NR 665.0016(1)(a)). If there is no training program go to question 8.A.	Y	662.034(1)(d) Photo☐
B. Program is directed by a person trained in hazardous waste management procedures (NR 665.0016(1)(b)).	Y	662.034(1)(d) Photo☐
C. Program teaches facility personnel hazardous waste management procedures relevant to the positions in which they are employed (NR 665.0016(1)(b)).	Y	662.034(1)(d) Photo☐
D. Training program ensures personnel are able to respond effectively to emergencies by familiarizing them with the following applicable items (NR 665.0016(1)(c)): 1. Contingency plan implementation. 2. Procedures for using, inspecting, repairing, and replacing emergency and monitoring equipment. 3. Key parameters for automatic waste feed cut-off systems. 4. Communications and alarm systems. 5. Response to fires or explosions. 6. Response to groundwater contamination incidents. 7. Shutdown of operations.	Y	662.034(1)(d) Photo☐
E. New employees are trained within 6 months of their assignment (NR 665.0016(2)).	N/A	662.034(1)(d) Photo☐
F. Employees work in supervised positions until they have completed the training (NR 665.0016(2)).	Y	662.034(1)(d) Photo☐
G. Personnel take part in an annual review of the training (NR 665.0016(3)).	N	662.034(1)(d) Photo☐
H. Generator keeps ALL of the following training documents (NR 665.0016(4)): 1. Job title and the employee name for each position related to hazardous waste management. 2. Job description for each of the above job titles. 3. Description of the amount and type of introductory and continuing training that will be given to each employee. 4. Records that required training has been given to each employee.	N	662.034(1)(d) Photo☐
I. Training records are maintained until closure for current personnel and at least 3 years from the date the employee last worked at the facility (NR 665.0016(5)).	Y	662.034(1)(d) Photo☐

Section 8: 90-Day Container Accumulation

A. Waste is accumulated in containers. If NO, go to Section 9.	Y	Photo☐
B. Accumulation start date is clearly marked and visible for inspection on each container.	N	662.034(1)(b) Photo☐
C. All containers are clearly marked with the words "Hazardous Waste".	Y	662.034(1)(c) Photo☐

Section 6: Contingency Plan and Emergency Procedures

B. Generator has amended a SPCC plan or other emergency plan so it sufficiently incorporates hazardous waste management provisions (NR 665.0052(2)).	Y	662.034(1)(d) Photo ☐
C. Copies of the contingency plan and all revisions have been made available to police, fire, hospital and emergency response teams. (NR 665.0052(3)). Updating current plan	Y	662.034(1)(d) Photo ☐
D. Contingency plan was amended due to ANY of the following (NR 665.0054): 1. Contingency plan failed in an emergency. 2. Change in site design, construction, O&M, or other circumstances which affect emergency response. 3. Emergency coordinators changed. 4. Emergency equipment changed. currently done.	Y	662.034(1)(d) Photo ☐
E. Contingency plan identifies an emergency coordinator who meets ALL of the following (NR 665.0055): 1. Available or on call to coordinate emergency response measures. 2. Familiar with all aspects of site activities and the contingency plan. 3. Has authority to commit the resources needed to carry out the contingency plan.	Y	662.034(1)(d) Photo ☐
F. Contingency plan includes ALL of the following (NR 665.0052): 1. Designation of the primary emergency coordinator, with alternates listed in the order of assuming responsibility. minority 2. Name, address and phone number, office and home, for each emergency coordinator. 3. Description of the arrangements agreed to by the police, fire, hospitals and emergency response teams to coordinate emergency services. 4. Evacuation plan for personnel including signal(s) to be used in the event of evacuation and alternate routes. 5. Actions facility personnel will take in response to a fire, explosion, or hazardous waste discharge. 6. List of emergency equipment at the site, including location, description and capabilities of each item.	Y	662.034(1)(d) Photo ☐
G. Contingency plan requires the emergency coordinator to do ALL of the following in the event of a fire, explosion, or discharge of hazardous wastes (NR 665.0056): 1. Activate internal alarms or communication systems. 2. Notify appropriate authorities, if their help is needed. 3. Identify the character, source, amount, and extent of discharged hazardous materials. 4. Assess hazards to human health and the environment. 5. If the incident threatens human health or the environment outside the facility, notify local authorities that evacuation may be necessary and notify the national response center (800-424-8802) and the division of emergency government (800-943-0003). 6. Take all reasonable measures necessary to ensure fires, explosions and discharges do not occur, reoccur, or spread. 7. Monitor for leaks, pressure buildup, gas generation or ruptures in valves, pipes, or other equipment if the site stops operation. 8. Provide for treating, storing, or disposing of recovered waste, contaminated soil, surface water, or other material. 9. Ensure wastes that are incompatible with the released material are not treated, stored or disposed until cleanup is completed. 10. Ensure that emergency equipment is clean and fit for use prior to resuming operations. 11. Notify the department and appropriate state and local authorities before resuming operations. 12. Submit an incident report to the department within 15 days.	Y	662.034(1)(d) Photo ☐

Section 4: Annual Reports and Exception Reporting

A. Annual reports covering generator activities during the calendar year have been submitted to the Department by March 1 of the following year.	Y	662.041 Photo☐
B. Transporter or TSD is contacted if signed manifest is not received in 35 days.	N/A	662.042(1) Photo☐
C. Exception report is submitted to the Department if a signed manifest is not received within 45 days.	N/A	662.042(2) Photo☐
D. Copy of each annual report and exception report is kept for at least 3 years from the date of the report.	Y	662.040(2) Photo☐

Section 5: Preparedness and Prevention

A. Generator has ALL of the following, unless the equipment is not necessary for the types of wastes handled (NR 665.0032): 1. Device to summon emergency assistance (e.g., telephone, 2 way radio). 2. Internal communications and alarm systems. 3. Portable fire extinguishers. records kept. sample 4. Fire control equipment, including special extinguishing equipment. 5. Spill control equipment. 6. Decontamination equipment (e.g., eyewash, shower). 7. Water at adequate volume and pressure to supply water spray systems.	Y	662.034(1)(d) Photo☐
B. All of the above emergency equipment is tested and maintained to assure its proper operation in an emergency (NR 665.0033).	Y	662.034(1)(d) Photo☐
C. There is immediate access to internal or external alarms or an emergency communication device in hazardous waste handling areas (NR 665.0034).	Y	662.034(1)(d) Photo☐
D. Generator has made ALL of the following arrangements with emergency organizations (NR 665.0037): 1. Primary and support roles have been defined if multiple police and fire departments could respond to an emergency. 2. Police, fire and emergency response teams are familiar with the site layout, hazards of the waste handled, places where personnel work, entrances and roads in the site and possible evacuation routes. 3. Agreements are made with emergency response contractors and equipment suppliers. 4. Local hospitals are familiar with the properties of wastes handled and the types of injuries or illnesses that could result from an emergency.	Y	662.034(1)(d) Photo☐
E. Aisle space provided throughout the facility to allow for the unobstructed movement of personnel and all emergency equipment (NR 665.0035).	Y	662.034(1)(d) Photo☐

Section 6: Contingency Plan and Emergency Procedures

Plan date 06/10/13

A. Generator has a written contingency plan, amended SPCC plan or other emergency plan that will be implemented immediately in the event of a fire, explosion or hazardous waste discharge (NR 665.0051). If there is no written plan go to question 7.A.	Y	662.034(1)(d) Photo☐

Section 2: Manifest, Pre-Transport Requirements and Off-Site Shipments

K. Hazardous waste is labeled according to applicable DOT requirements before transport.	Y	662.031 Photo☐
L. Hazardous waste is marked according to applicable DOT requirements before transport.	Y	662.032(1) Photo☐
M. Containers of 119 gallons and less are marked with the "Hazardous Waste-Federal law prohibit improper disposal" label before transport.	Y	662.032(2) Photo☐
N. Placards are offered to the initial transporter. Transporter Provided.	Y	662.033 Photo☐

Section 3: Land Disposal Restrictions

A. Generator determined if each waste is prohibited from land disposal by lab analysis or generator knowledge.	Y	668.07(1) Photo☐
B. Generator complies with the prohibition against dilution of wastes.	Y	668.03 Photo☐
C. A one-time written notice was sent to each treatment, storage or disposal facility with the initial waste shipment.	Y	668.07(1) Photo☐
D. A new notification is sent to the TSD and maintained in the generator file when the waste or receiving facility changes.	Y	668.07(1) Photo☐
E. If the waste MEETS treatment standards, the LDR notice certifies wastes may be land disposed without further treatment.	N/A	668.07(1) Photo☐
F. If the waste EXCEEDS treatment standards, the LDR notice gives notification of appropriate treatment and applicable prohibitions.	Y	668.07(1) Photo☐
G. A copy of the LDR notifications and certifications are retained for at least 3 years from the date the waste was last sent off-site.	Y	668.07(1)(h) Photo☐
H. Underlying hazardous constituents have been identified for characteristic wastes.	Y	668.09(1) Photo☐
I. Generator identifies EITHER of the following when the waste is both a listed and characterisitic waste: 1. The treatment standards for the listed waste code, in lieu of the treatment standard for the characteristic waste codes. 2. The treatment standards for all applicable listed and characteristic waste codes.	Y	668.09(2) Photo☐
J. If waste is treated in containers or tanks, the generator meets BOTH of the following (NR 668.07(1)(e): 1. Developed a written waste analysis plan describing the procedures used to meet applicable LDR treatment standards. 2. Complies with the certification requirements in NR 668.07(1)(c).	N/A	662.034(1)(d) Photo☐

LARGE QUANTITY GENERATOR INSPECTION

Revision: 03/19/2012
WASTE & MATERIALS
MANAGEMENT PROGRAM

This Inspection Form, used for the inspection of facilities that generate over 1000 kg (2205 lbs) of non acute hazardous waste in a calendar month or over 1 kg of acute hazardous waste in a calendar month, evaluates compliance with Wisconsin's Hazardous Waste Management Rules (chapter NR 660 - 679, Wis. Admin. Code).

Section 1: Waste Information

A. Hazardous waste determination has been made on each solid waste generated.	N	662.011 Photo ☐
B. Waste determination was made correctly, considering the listed waste definitions and the characteristics of the waste, in light of the materials or processes used.	Y	662.011(3) Photo ☐
C. Waste samples are analyzed by laboratories certified or registered under NR 149. Provide lab names and certification numbers.	Y	662.011(3)(a)1 Photo ☐
D. Generator keeps records of all waste determinations on-site for at least three years from the date the waste was last sent to a storage, treatment or disposal facility.	Y	662.040(3) Photo ☐
E. Generator submitted a notification form and obtained an EPA ID#. Note: A subsequent notification should be submitted when there is an ownership or name change.	Y	662.012 Photo ☐

Section 2: Manifest, Pre-Transport Requirements and Off-Site Shipments

A. Generator initiated a manifest with all off-site shipments of hazardous waste.	Y	662.020(1) Photo ☐
B. The manifest is used according to the instructions in the appendix to 40 CFR part 262.	Y	662.020(1) Photo ☐
C. The facility designated on the manifest is permitted or licensed to accept the waste.	Y	662.020(2) Photo ☐
D. For out-of-state shipments, a copy of the manifest is sent to the department within 30 days of receiving the signed copy from the designated facility.	Y	662.023(3) Photo ☐
E. Manifest continuation form, EPA form 8700-22A, is prepared according to the instructions in the appendix of 40 CFR part 262.	Y	662.020(1) Photo ☐
F. If the generator received a shipment back as a rejected load, the returned waste was accumulated in compliance with the container or tank standards for less than 90 days.	N/A	662.034(13) Photo ☐
G. Upon receipt of the rejected shipment, the generator signed EITHER of the following: 1. Manifest Item 18c if the transporter returned the shipment using the original manifest. 2. Manifest Item 20 if the transporter returned the shipment using a new manifest.	N/A	662.034(13) Photo ☐
H. A copy of the manifest signed by the generator is retained until the signed copy from the designated facility is received.	Y	662.040(1) Photo ☐
I. Copy of each manifest is kept for at least three years from the date of shipment.	Y	662.040(1) Photo ☐
J. Hazardous waste is packaged according to applicable DOT requirements before transport.	Y	662.030 Photo ☐

LARGE QUANTITY GENERATOR INSPECTION

Section 17: Generator Status Evaluation

A. Waste is accumulated for less than 90 days, except as allowed in Sections 13 and 16.	N	662.034(1) Photo ☐
B. More than 2,205 lbs. of non-acute hazardous waste; 2.2 lbs. of acute hazardous waste; or, 220 lbs. of residue from cleanup of an acute hazardous waste spill is generated in any month (NR 662.190(1), NR 662.220(4)).	Y	 Photo ☐
C. Describe other activities that the generator conducts at the facility (accumulation in tanks, recycling, 10-day transfer, transporter, used oil, treatment, storage, disposal, universal waste, etc.). Universal Waste Lamps, Mixed Oil		 Photo ☐
D. If waste was previously accumulated in a tank system, the generator performed EITHER of the following (NR 665.0197(1), NR 665.0197(2)): 1. Closure by removing or decontaminating waste residues, contaminated containment system components, soils, structures and equipment. 2. Initiated long-term care if all contaminated soils cannot be practicably removed or decontaminated.	N/A	662.034(1)(a)2 Photo ☐

UNIVERSAL WASTE HANDLER INSPECTION REPORT - LARGE QUANITY HANDLER

Revision: 10/10/2011
WASTE & MATERIALS MANAGEMENT PROGRAM

This Inspection Form, used for the inspection of facilities that generate or handle 5000 kg or more of universal waste (hazardous waste batteries, pesticide, lamps, antifreeze, and some mercury containing devices), evaluates facility compliance with Wisconsin's Hazardous Waste Management Rules (chapters NR 660-679, Wis. Admin. Code). The Universal waste regulations streamline the requirements for hazardous waste batteries, pesticide, lamps, antifreeze, and some mercury containing devices. Persons treating, disposing, recycling, or otherwise processing universal wastes are subject to applicable hazardous waste regulations.

Section 1: Prohibitions

A. Universal waste is not disposed on-site.	N	673.31(1) Photo ☐
B. Universal waste is not diluted or treated on-site. Note: Dilution or treatment does not include: sorting, mixing, discharging, regenerating, or disassembling batteries; removing batteries from consumer products or removing electrolytes; removing thermostat ampules; or, responding to a release of universal waste.	N	673.31(2) Photo ☐

Section 2: General Standards

A. Universal waste batteries and thermostats that are broken or show evidence of leakage or spillage are placed in closed, structurally sound containers that are compatible with the waste and not leaking. / not managed	C	673.33 Photo ☐
B. Universal waste ~~pesticides~~ and lamps are placed in closed, structurally sound containers that are compatible with the waste and not leaking.	C	673.33 Photo ☐
C. Sorting, mixing or handling of batteries is only conducted if the battery casing is not breached and remains intact.	C	673.33(1)(b) Photo ☐
D. Wastes generated by handling or cleaning up spills of universal wastes are managed according to hazardous waste or solid waste rules.	C	673.33 Photo ☐
E. If mercury containing ampules are removed from thermostats, the handler meets ALL of the following: 1. Ampules are removed In a manner that prevents breakage. 2. Removal is conducted over a containment device. 3. Spills or leaks are cleaned up immediately. 4. Removal is performed in a well ventilated, monitored environment.	NA	673.33(3)(b) Photo ☐
F. Pesticides are placed in a tank that meets NR 665 subch. J requirements, except closure and post closure requirements in NR 665.0197(3) and waste analysis requirements in NR 665.0200.	N/A	673.33(2) Photo ☐
G. Pesticides are placed in a transport vehicle or vessel that is closed, structurally sound, not leaking and compatible with the waste.	N/A	673.33(2) Photo ☐
H. All universal wastes are labeled or marked "Waste" or "Used" followed by the specific type of universal waste handled or "Universal Waste".	N	673.34 Photo ☐
I. Containers, tanks, or transport vehicles of recalled pesticides are additionally marked with the label that was on or accompanied the product when it was sold or distributed.	NA	673.34 Photo ☐
J. Length of accumulation time is demonstrated by ANY of the following: 1. Mark or label each container with the earliest date the waste is generated or received. 2. Mark or label the individual item of waste with the date it was generated or received. 3. Maintain an inventory system identifying the date the waste was generated or received. 4. Place the universal waste in a specific accumulation area identified with the earliest date the waste was generated or received. 5. Use some other method that clearly demonstrates the length of accumulation time.	Y	673.35(3) Photo ☐
K. Universal waste is accumulated for less than one year from the date generated or received from another handler.	Y	673.35(1) Photo ☐

UNIVERSAL WASTE HANDLER INSPECTION REPORT - LARGE QUANITY HANDLER

Section 2: General Standards

L. If universal waste is accumulated beyond one year, the handler can prove that accumulation was necessary to facilitate proper recovery, treatment or disposal.	N/A	673.35(2) Photo ☐
M. Employees are trained on the proper handling and emergency procedures appropriate to the types of waste handled at the facility.	Y	673.36 Photo ☐
N. Handler complies with ALL of the following when a release occurs: 1. Immediately contains the release. 2. Determines if the spill residue is hazardous waste. 3. If hazardous waste, disposes of it as such.	Y	673.37 Photo ☐
O. EPA ID# was obtained before meeting or exceeding 5,000 kg (11,025 lb).	N/A	673.32(1) Photo ☐

Section 3: Off-site Shipments

A. Handler sends the waste to a destination facility, foreign destination or another handler.	Y	673.38(1) Photo ☐
B. Handler that self-transports complies with ALL of the following: 1. Applicable US DOT regulations in 49 CFR parts 171 to 180 when transporting universal waste that meets the definition of hazardous materials. 2. Immediately contain release and make waste determination on spill residue. 3. If shipped to a foreign destination other than an OECD country, use an EPA acknowledgement of consent.	N/A	673.38(2) Photo ☐
C. For hazardous materials, the handler packages, labels, marks, placards and prepares the proper shipping papers in accordance with DOT requirements in 49 CFR parts 172 to 180.	Y	673.38(3) Photo ☐
D. If shipping to another universal waste handler, the handler has agreed to receive the shipment.	Y	673.38(4) Photo ☐
E. If a shipment was rejected, EITHER of the following occurred: 1. The waste was sent back to the originating handler. 2. The originating handler agreed on a destination facility to which to ship the waste.	N/A	673.38 Photo ☐
F. The handler immediately notifies the Department if they receive a shipment containing hazardous waste.	N/A	673.38(7) Photo ☐
G. Nonhazardous, nonuniversal waste in a universal waste shipment is managed in compliance with the solid waste requirements.	Y	673.38(8) Photo ☐

Section 4: Record Keeping

A. Records for each shipment of universal waste received at the facility contains ALL of the following information: 1. The name and address of the originating handler or foreign shipper. 2. The quantity of each type of universal waste received. 3. The date the shipment was received.	Y	673.39(1) Photo ☐

Section 4: Record Keeping

B. Records for each shipment of universal waste sent off-site contains the following information 1. The name and address of the facility to which the waste was sent. 2. The quantity of each type of universal waste sent. 3. The date the shipment of universal waste left the facility.	Y	673.39(2) Photo ☐
C. Records are retained for at least 3 years from the date the shipment was received or from the date the shipment left the facility.	Y	673.39(3) Photo ☐